

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

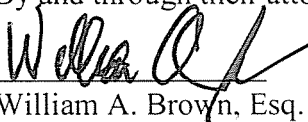
United States of America)
v.)
John J. Diamont, Jr.,)
Defendant)
_____)

Criminal No. 05-10154-MLW

MOTION TO QUASH

Now come Yale Strogoff, Roberta Strogoff, Steven Strogoff and any companies or trusts under their control and move to quash subpoenas directed to their accountants and administrators (see attached schedules) on grounds that said documents are privileged, protected by statute, not relevant to this proceedings, not reasonable discoverable since no Strogoff is a party to this proceeding.

Respectfully submitted,
Yale Strogoff,
Roberta Strogoff,
Steven Strogoff
By and through their attorney,

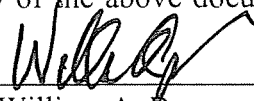


William A. Brown, Esq.
BBO #061280
31 Milk Street
Suite 501
Boston, MA 02109
(617) 482-1001
(617) 423-4058 (fax)

CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the above document was served upon the attorney of record by ECF filing.

Date 3/3/06



William A. Brown
BBO # 061280

AO89 (Rev. 7/93) Subpoena in a Criminal Case

UNITED STATES DISTRICT COURT

DISTRICT OF

Massachusetts

United States of America

V.

John J. Diamont, Jr

SUBPOENA IN A CRIMINAL CASE

Case Number. 1:05-cr-10154-MLW

TO: Keeper of Records
O'Brien Grant Associates
200 Walnut Street, Suite F
Saugus, MA 01906-1158

☒ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below, or any subsequent place, date and time set by the court, to testify in the above referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

PLACE	COURTROOM
John Joseph Moakley Federal Courthouse 1 Courthouse Way Boston, MA 02210	
	DATE AND TIME
	2/8/2006 9:00 am

☒ YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):

See attached Schedule A

U.S. MAGISTRATE JUDGE OR CLERK OF COURT	DATE
Magistrate Judge Andrew G. Dunn	2/13/06
(By) Deputy Clerk	
ATTOENEY'S NAME, ADDRESS AND PHONE NUMBER:	
Michael Kendall, Esq. 28 State Street, Boston, MA 02109 (617) 535-4000	

**O'Brien Grant Associates
200 Walnut Street, Suite F
Saugus, MA 01906-1158**

SCHEDULE A

All documents from or relating to the time period January 1, 1995, through December 31, 2001, that refer or relate to any profit sharing plan administered on behalf of Yale Strogoff, Steven Strogoff, or any companies or entities under their control, including, without limitation, S. Strogoff & Company, Inc. and Strogoff Steel Trading Corp.

AO89 (Rev. 7/95) Subpoena in a Criminal Case

UNITED STATES DISTRICT COURT

DISTRICT OF

Massachusetts

United States of America

V.

John J. Diamont, Jr.

SUBPOENA IN A
CRIMINAL CASE

Case Number: 1:05-cr-10154-MLW

TO: Keeper of Records
Abrams Little-Gill Loberfeld PC
1330 Boylston Street
Chestnut Hill, MA 02467

- ☒ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below, or any subsequent place, date and time set by the court, to testify in the above referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

PLACE

John Joseph Moakley Federal Courthouse
1 Courthouse Way
Boston, MA 02210

COURTROOM

DATE AND TIME

2/6/2006 9:00 am

- ☒ YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):

See attached Schedule A

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

Magistrate Judge Judith G. Dein

(By) Deputy Clerk

DATE

1/13/06

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

Michael Kendall, McDermott Will & Emery LLP
28 State Street, Boston, MA 02109.
(617) 535-4000

Abrams Little-Gill Loberfeld PC
1330 Boylston Street
Chestnut Hill, MA 02467

SCHEDULE A

All documents from or relating to the time period January 1, 1995, through December 31, 2001, that refer or relate to the preparation and filing of tax returns for the Strogoff Family. This includes, without limitation, all accounting work papers, client records, and correspondence.

The term "Strogoff Family" means Yale Strogoff, Roberta Strogoff, Steven Strogoff, and any company, trust, or entity controlled or owned by them, including, without limitation, S. Strogoff & Company, Inc. and Strogoff Steel Trading Corp.